

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MARIO PILLCO MOROCHO, et al, )  
Plaintiffs )  
)  
)  
v. )  
)  
)  
BRISTOL COUNTY SHERIFF'S )  
OFFICE, et al, )  
Defendants )

Civil Action No:  
1:22-10652-WGY

**DEFENDANTS BRISTOL COUNTY SHERIFF'S OFFICE, SHERIFF THOMAS  
HODGSON AND SUPERINTENDENT STEVEN SOUZA'S MOTION TO CONTINUE  
HEARING AND FOR EXTENSION OF TIME**

NOW come Defendants, Bristol County Sheriff's Office, Sheriff Thomas Hodgson and Superintendent Steven Souza, and respectfully requests this Honorable Court to continue and extend, for a period of 40 days or to a date thereafter convenient to the Court, the hearing scheduled on March 28, 2023 on Defendant Department of Homeland Security, United States of America's motion to dismiss and the deadlines for all discovery, required responses, and other deadlines in this case (excluding the ready for trial date), and state as reasons the following:

1. On January 3, 2023, Paul Heroux was sworn in as the new Sheriff of the Bristol County Sheriff's Office.
2. On January 3, 2023, the undersigned counsel left the Sheriff's Office.
3. Sheriff Heroux has been in the process of onboarding counsel and has retained Leon King, II, Esquire to be the lead counsel in representing the Department in this case.
4. Mr. King is in the process of obtaining a Special Attorney Assistant General

designation (“SAAG”) from the Massachusetts Office of the Attorney General.

5. Mr. King has applied for admission to the bar of this Court and expects addition to be granted very shortly.
6. Mr. King cannot officially appear before the Court until one or both of these contingencies occur and thereafter he will need some time to familiarize himself with this case and to respond to the matters pending herein.
7. Sheriff Paul Heroux is also in the process of onboarding a new General Counsel who will begin on or about March 6, 2023.
8. The undersigned counsel expects that successor counsel once the above contingencies occur will be filing an appearance in this matter and that the undersigned counsel will withdraw from the case at that time.

WHEREFORE, the Defendants Bristol County Sheriff’s Office, Sheriff Thomas Hodgson and Superintendent Steven Souza request that the Court allow their motion for a continuance and extension of time of 40 days or to a date thereafter convenient to the Court.

Respectfully submitted,  
Defendants Bristol County Sheriff’s Office,  
Sheriff Thomas Hodgson and  
Superintendent Steven Souza

By their attorney,

/s/ Bruce A. Assad  
Bruce A. Assad, Esq., BBO # 022980  
Special Assistant Attorney General  
16 Bedford Street  
Fall River, MA 02720  
(508) 673-2004  
[baalawfirm@aol.com](mailto:baalawfirm@aol.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served on the attorneys on record by means of the Court's Electronic Case Filing system on 17<sup>th</sup> day February 2023.

/s/ Bruce A. Assad

Bruce A. Assad, Esq.